

IN THE UNITED STATES BANKRUPTCY COURT FOR THE
EASTERN DISTRICT OF TENNESSEE
NORTHERN DIVISION

IN RE:)
)
JOHN EDWARD CHAMBERS d/b/a) Bankruptcy No. 08-31399
CHAMBERS FARM, fdba) CHAPTER 12
CHAMBERS DAIRY, and)
PATRICIA STACEY CHAMBERS,)
)
Debtors.)

APPLICATION BY DEBTORS IN POSSESSION
TO EMPLOY ATTORNEY

Comes debtors, John E. Chambers and Patricia S. Chambers, and request to employ an attorney to represent them and, in support of their application, would show:

1. They are Debtors in Possession in this Chapter 12 case.
2. They require the assistance of counsel to:
 - a) Advise and represent applicants in all legal proceedings which may arise during the administration of this case.
 - b) Assist applicants in the formulation of a plan of reorganization.
 - c) Prepare or approve legal documents necessary to accomplish the reorganization of the estate.
 - d) Examine proofs of claim for objectionable claims and file objections, if appropriate.

- e) Litigate the recovery of preferential transfers or fraudulent conveyances should they exist.
- f) Preparation of documents to sell assets of the estate, if necessary.

3. They propose to employ Wade M. Boswell as their attorney. They state that he, as an attorney, is disinterested as the term is defined in 11 U.S.C. Section 101(14) and the firm represents or holds no adverse interest as to the matters for which the firm is to be employed.

4. Their proposed attorney, Wade M. Boswell, is fully admitted to practice before this Court and other necessary state and federal courts in this jurisdiction.

5. The normal billing rate for Wade M. Boswell is \$225.0 per hour. It is contemplated that Wade M. Boswell will seek interim compensation as permitted by U.S.C. Section 331.

6. They have paid Wade M. Boswell advance retainer of \$2,239.00, being \$1,950.00 for pre-filing assistance and \$289.00 for the filing fee. The retainer and prepaid expenses will be taken into account in any application for fees and will set forth in detail all services and expenses in the first application for allowance in compensation and expenses. All applications will contain a full detailed accounting of services rendered, expenses incurred, and the pre-petition retainer, having already been exhausted, will always be included in the appropriate applications.

WHEREFORE, applicants, John W. Chambers and Patricia S. Chambers, respectfully request that they be permitted to employ Wade M. Boswell by appropriate order.

DATED this 28th day of March, 2008.

DEBTORS IN POSSESSION:

/s/ John E. Chambers
JOHN E. CHAMBERS

/s/ Patricia S. Chambers
PATRICIA S. CHAMBERS

CERTIFICATE

I certify a true copy of the foregoing Application by Debtors in Possession to Employ Attorney, Verified Statement and Order Appointing Attorney has been served electronically on:

1. Patricia C. Foster
Attorney for U.S. Trustee
2. C. Kenneth Still
Chapter 12 Trustee

Dated this 2nd day of April, 2008.

/s/ Wade M. Boswell
WADE M. BOSWELL, ATTORNEY